

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CONSOLIDATION COAL COMPANY,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 00-2120
)	
UNITED STATES DEPARTMENT OF THE)	
INTERIOR, NATIONAL PARK SERVICE,)	Electronically Filed
)	
and)	
)	
CAROL D. SCHULL, individually and in her)	
capacity as the Keeper of the National Register)	
of Historic Places,)	
)	
and)	
)	
ROY and DIANE BRENDDEL,)	
)	
Defendants.)	

UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Pursuant to Fed. R. Civ. P. 7, the Federal defendants move the Court for an enlargement of time for response to the Amended Complaint filed on November 29, 2005 by Consolidation Coal Company (Consol) in this matter. The Federal defendants request that this Court enter an order enlarging the time for response to the Amended Complaint until December 23, 2005. The reasons for this motion are set forth below.

1. On November 23, 2005, this Court granted Consol's motion for leave to file an amended complaint.
2. On November 29, 2005, Consol filed the Amended Complaint.
3. Under Fed. R. Civ. P. 15(a), the Federal defendants' response would be due

December 13, 2005.

6. Federal defendants require a short additional time to prepare the response to the Amended Complaint.

Counsel for Consol been consulted and does not oppose this motion.

THEREFORE, the Federal defendants move this court for an order enlarging the time for response to the Amended Complaint until December 23, 2005.

Dated this 13th day of December, 2005

Respectfully submitted,

MARY BETH BUCHANAN
United States Attorney

S/ Albert W. Schollaert
ALBERT W. SCHOLLART
Assistant U.S. Attorney
Western District of Pennsylvania
700 Grant Street, Suite 4000
Pittsburgh, PA 15219

SUE ELLEN WOOLDRIDGE
Assistant Attorney General
Environment & Natural Resources Div.

For S/ Albert W. Schollaert
RUTH ANN STOREY
U.S. Department of Justice
Environment & Natural Resources Div.
General Litigation Section
P.O. Box 663
Washington, D.C. 20044-0663
(202) 305-0493

OF COUNSEL:

STEVEN C. BARCLEY
U.S. Department of the Interior
Office of the Solicitor
Three Parkway Center, Room 385
Pittsburgh, Pa. 15220
(412) 937-4007

CERTIFICATE OF SERVICE

I certify that on December 13, 2005, a copy of the foregoing Unopposed Motion for
Enlargement of Time was served by First Class U.S. Mail on :

Joseph A. Katarincic
Thorp, Reed & Armstrong
One Oxford Center
310 Grant Street, 14th Floor
Pittsburgh, PA 15219-1425

David C. Hook
Hook & Hook
P.O. Box 792
Waynesburg, PA 15370

S/ Albert W. Schollaert
ALBERT W. SCHOLLART
Assistant U.S. Attorney